

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,)
v.)
NISREEN ASSAD IBRAHIM BAHAR,) Case No. 1:16-mj-63-MSN
a/k/a "Umm Sayyaf,")
Defendant.)

**NOTICE OF MOTION AND MOTION TO ENFORCE
MOVANTS' RIGHTS UNDER THE CRIME VICTIMS' RIGHTS ACT**

Pursuant to the Crime Victims' Rights Act ("CVRA"), 18 U.S.C. § 3771, Movants Mary Roe, Mary Roe II, Mary Roe III, Nasima Avdo Saleh, and Mary Roe VI (collectively, the "Movants") hereby request that the Court enter an order: (1) recognizing them as "crime victims" under the CVRA in the above-captioned litigation; and (2) requiring the Government to immediately give the victims all information necessary to effectuate their rights under the CVRA.

The Defendant directly participated in, or supported, the kidnaping, enslavement, rape, and/or physical and emotional abuse of the Movants, as part of the Islamic State of Iraq and the Levant ("ISIL")'s practice of enslaving Yazidi women and children. Because the Government has not kept the Movants apprised of basic information to which they are entitled under the CVRA, they now seek to enforce their CVRA rights and protections. The Movants' points and authorities are presented in the accompanying Memorandum and exhibits.

This Motion is made following the conference of counsel pursuant to Local Criminal Rule 47(E), which took place on April 16, 2021. Further pursuant to Local Criminal Rule 47(E), and the accompanying Notice of Hearing, the Movants respectfully request that oral argument be heard at 9:00 a.m. on Friday, May 14, 2021.

Dated: April 22, 2021

By: Katherine M. Davis

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CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2021, I submitted the foregoing notice with the Clerk of the Court via physical paper, as instructed. If my clients are permitted to appear in this case, and this filing is docketed, all registered parties will be notified via CM/ECF, which will serve true and correct copies on counsel of record.

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